July 25, 2022

Sarah Mellish, Chair Zoning Board of Appeals Town Hall Manchester, MA 01944

Re: SLV's application for "The Sanctuary at Manchester-by-the-Sea"

Dear Ms. Mellish:

As you know, SLV's application originally anticipated on-site sewage treatment. When evidence overwhelmingly indicated that such an approach posed serious threats to Town drinking water quality, the proponent altered the application to use Manchester's municipal sewage.

Access to municipal sewage disposal would require pipes under Route 128. Once installed, the Town's sewage system would be available not just to SLV, but to all the remaining unprotected land on Shingle Place Hill and east of upper School Street.

This land is watershed for the Lincoln Street well. The prospect of even more development in the watershed raises a special concern, as keeping as much as possible in a naturally wooded state is critical to protecting water quality for town residents.

The harmful environmental impacts of land development in watersheds are well known. As forest cover is cleared and land covered with concrete and asphalt, rainfall is less effectively absorbed into groundwater aquifers. Rainwater picks up gasoline, motor oil, heavy metals, and other pollutants in runoff from parking lots and roads. This threatens both the quality and quantity of water supplies.

For many years Manchester residents have invested in conservation projects designed to protect vital natural resources. Most of Shingle Place Hill lacks protection because owners of most of its woodlots chose not to participate in conservation efforts.

Even without on-site sewage disposal, the SLV project would adversely affect the watershed for the Lincoln Street well. **Disturbance of thin soils and bedrock granite by blasting, removal of acres of trees. and extensive regrading** are of deep concern.

This is in addition to other harmful environmental and health threats:

**Air pollution** The project's isolation from the town center would require *Sanctuary* residents to rely heavily on motorized transport. Vehicle emissions contribute to air pollution and its attendant negative impacts on human health. These emissions would impact residents in the village area as well.

**Light** pollution Neighboring woodland habitats would suffer, as the project would bring night-time light pollution to an area never-before illuminated. This would not avoid inevitably cause a reduction in biodiversity in adjacent wooded areas. Birds and other woodland animals, most of whom have nocturnal habits, flee brightly lit areas. One of Manchester's proudest achievements —the large Core Habitat and

Critical Natural Landscape areas identified by the Commonwealth's Natural Heritage and Endangered Species in the Manchester-Essex Woods —would almost surely shrink.

**Adding to climate change** Then there are the existential threats from a warming climate. Scientists urge us to stop cutting down trees whose stored carbon helps moderate temperature rise. We should take this advice, and find tree-free or less sensitive wooded areas to build on.

I write this as a longtime resident who has worked for many years within Town government and with privately funded entities to preserve Manchester's outstanding natural resources. That work introduced me to many residents who care deeply about our local environment and have given time, intelligence, and funds to protect the area's natural beauty, wildlife, and resources.

Their conservation work continues an effort begun in the 19<sup>th</sup> century by public-spirited residents who saw a need and organized to meet it —we are now doing the same for truly affordable housing. The SLV project would be a major setback to this effort — all for a project that while threatening vital community resources, would fail to provide for Manchester's actual affordable housing needs. There is obviously a much better way to meet these needs.

Thank you for all the hard work you have done on this project, including the project's many environmental impacts, potential as well as inherent.

Sincerely,

Helen D. Bethell